

JAP:DG

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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15M 1011

UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960)

BRINSLEY LONDON,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

KEVIN O'MALLEY, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about October 22, 2015, within the Eastern District of New York and elsewhere, the defendant BRINSLEY LONDON did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and belief are as follows:¹


1. On or about October 22, 2015, the defendant BRINSLEY LONDON arrived at John F. Kennedy International Airport ("JFK") in Queens, New York aboard Caribbean Airlines flight no. 524 from Suriname by way of Trinidad and Tobago.

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. Upon his arrival at JFK, the defendant BRINSLEY LONDON was selected for an examination by United States Customs and Border Protection ("CBP"). The defendant had two checked black "Langchao" bags. The defendant acknowledged that the bags and their contents belonged to him, and that he packed the bags himself. Upon examination of the first bag, the CBP officer observed that the bottom wall of the bag was thick and lumpy. The CBP officer subsequently probed the bottom of the bag, revealing a white, powdery substance. A probe of the second bag also revealed a white, powdery substance. A field test of the substance was positive for cocaine. The total approximate gross weight of the cocaine was 5,146.5 grams.

WHEREFORE, your deponent respectfully requests that the defendant BRINSLEY LONDON be dealt with according to law.

Dated: Brooklyn, New York
October 23, 2015



KEVIN O'MALLEY
Special Agent
United States Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
23rd day of October, 2015

THE HONORABLE RAMON E. REYES
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK